

ANNA Y. PARK, CA SBN 164242
AMRITA MALLIK, CA SBN 249152
U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION
255 E. Temple Street, 4th Floor
Los Angeles, California 90012
Telephone: (213) 894-1080
Facsimile: (213) 894-1301
E-mail: lado.legal@eeoc.gov

Attorneys for Plaintiff EEOC

UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

EQUAL EMPLOYMENT) Civil No: 1:12-cv-00530-SOM-RLP
OPPORTUNITY COMMISSION,)
) NOTICE OF SETTLEMENT
Plaintiff,)
)
v.)
)
PANDA EXPRESS, INC. and PANDA)
RESTAURANT GROUP, INC.; and)
DOES 1-15, INCLUSIVE;)
)
Defendants.)

TO THE COURT AND ALL COUNSEL OF RECORD:

All parties and their counsel appeared before Joel Grossman, Esquire for mediation of the above entitled matter on January 17, 2013.

Anna Park, Regional Attorney, and Amrita Mallik, Senior Trial Attorney, appeared on behalf of the EEOC. Steven Moore, Esq., Ogletree, Deakins, Nash, Smoak & Stewart, P.C. and Monte Baier, Senior Vice Preseident and General Counsel, appeared on behalf of Defendants Panda Restaurant Group, Inc. and Panda Express, Inc. All parties were present or were represented by persons with

full settlement authority. At that time the parties reached agreement with respect to the monetary relief terms of a settlement and reached agreement in principle regarding injunctive relief and all other terms of a Consent Decree to be submitted to this Court for approval.

The parties hereby provide this notice to the Court that they have reached agreement on the majority of the terms of that decree and are in the process of finalizing a Consent Decree resolving this action in its entirety for this Court's review and approval.

Respectfully submitted,

Date: February 4, 2013

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION

/s/ Amrita Mallik

Amrita Mallik
Senior Trial Attorney

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

/s/ Steven Moore

Steven W. Moore

PROOF OF SERVICE VIA ELECTRONIC FILING SYSTEM

I am, and was at the time the herein mentioned mailing took place, a citizen of the United States, over the age of eighteen (18) years and not a party to the above-entitled cause.

I am employed in the Legal Unit of the Los Angeles District Office of the United States Equal Employment Opportunity Commission.

My business address is Equal Employment Opportunity Commission, Honolulu Local Office, 300 Ala Moana Boulevard, Room 7-127, Honolulu, Hawaii 96850.

On the date that this declaration was executed, as shown below, I served the foregoing NOTICE OF SETTLEMENT via the Case Management/Electronic Case Filing (CM/ECF) system at Honolulu, County of Honolulu, Hawaii to:

STEVEN W. MOORE, Esq.
Ogletree Deakins
1700 Lincoln Street, Suite 4650
Denver, CO 80203
E-mail: steven.moore@ogletreedeakins.com

I declare under penalty of perjury that the foregoing is true and correct.
Executed on February 4, 2013, Honolulu, Hawaii.

/s/ Amrita Mallik